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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

11 | UNITED STATES OF AMERICA,

12 Plaintiff,

v.

14 JUAN CARLOS MARTINEZ CASTRO, and
SHANNON JEFFRIES,

Defendants.

CASE NO. 2:19-CR-00233-TLN

**STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER**

DATE: December 17, 2020

TIME: 9:30 a.m.

COURT: Hon. Troy L. Nunley

STIPULATION

1. By previous order, this matter was set for status on December 17, 2020.

2. By this stipulation, the defendants now move to continue the status conference until

February 25, 2021, at 9:30 a.m., and to exclude time between December 17, 2020, and February 25, 2021, under Local Code T4.

3. The parties agree and stipulate, and request that the Court find the following:

a) Counsel for defendants desire additional time consult with their clients, review the discovery, conduct defense investigation and research, discuss potential resolution, and otherwise prepare for trial.

b) Counsel for defendants believe that failure to grant the above-requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

1 c) The government does not object to the continuance.

2 d) Based on the above-stated findings, the ends of justice served by continuing the
3 case as requested outweigh the interest of the public and the defendant in a trial within the
4 original date prescribed by the Speedy Trial Act.

5 e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
6 et seq., within which trial must commence, the time period of December 17, 2020 to February
7 25, 2021, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local
8 Code T4] because it results from a continuance granted by the Court at defendant's request on
9 the basis of the Court's finding that the ends of justice served by taking such action outweigh the
10 best interest of the public and the defendant in a speedy trial.

11 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
12 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
13 must commence.

14 IT IS SO STIPULATED.

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16 Dated: December 14, 2020

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18 MCGREGOR W. SCOTT
19 United States Attorney

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21 _____
22 /s/ JUSTIN L. LEE
23 JUSTIN L. LEE
24 Assistant United States Attorney

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26 Dated: December 14, 2020

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28 _____
29 /s/ HANNAH LABAREE
30 HANNAH LABAREE
31 Counsel for Defendant
32 JUAN CARLOS MARTINEZ CASTRO

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34 Dated: December 14, 2020

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36 _____
37 /s/ CHRIS COSCA
38 CHRIS COSCA
39 Counsel for Defendant
40 SHANNON JEFFRIES

FINDINGS AND ORDER

IT IS SO FOUND AND ORDERED this 15th day of December, 2020.

Troy L. Nunley

Troy L. Nunley
United States District Judge